

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,)	
)	JURY TRIAL DEMANDED
v.)	
)	
ROSS INTELLIGENCE INC.,)	PUBLIC VERSION
)	
Defendant/Counterclaimant.)	

**DECLARATION OF BEATRICE B. NGUYEN IN SUPPORT OF DEFENDANT AND
COUNTERCLAIMANT ROSS INTELLIGENCE, INC.'S MOTION TO EXCLUDE
CERTAIN OPINIONS OF PLAINTIFFS AND COUNTERDEFENDANTS'
EXPERT DR. CHAD SYVERSON**

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THOMSON REUTERS ENTERPRISE)
CENTRE GMBH and WEST PUBLISHING)
CORPORATION,)
) C.A. No. 20-613-SB
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) JURY TRIAL DEMANDED
v.)
) FILED UNDER SEAL
ROSS INTELLIGENCE INC.,)
)
Defendant/Counterclaimant.)

**DECLARATION OF BEATRICE B. NGUYEN IN SUPPORT OF DEFENDANT AND
COUNTERCLAIMANT ROSS INTELLIGENCE, INC.’S MOTION TO EXCLUDE
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EXPERT DR. CHAD SYVERSON**

I, Beatrice B. Nguyen, declare as follows:

1. I am a partner at Crowell & Moring, LLP, lead counsel of record for ROSS Intelligence, Inc. I am an attorney admitted to the California Bar, and I am admitted *pro hac vice* with this Court. I submit this Declaration in support of Defendant and Counterclaimant ROSS Intelligence, Inc.’s (“ROSS”) Motion to Exclude Certain Opinions of Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation’s (“West,” and together with Thomson Reuters, “Counterdefendants”) Expert Dr. Chad Syverson.
2. A true and correct copy of the Rebuttal Expert Report of Chad Syverson, Ph.D., dated June 22, 2023, is attached hereto as **Exhibit A**.
3. A true and correct copy of excerpts from the transcript of Erik Lindberg’s deposition on April 24, 2023, is attached hereto as **Exhibit B**.

4. A true and correct copy of excerpts from the transcript of Michael L. Dahn's deposition on May 23, 2023, is attached hereto as **Exhibit C**.

5. A true and correct copy of the Report of Defendant/Counterclaimant's Expert James D. Ratliff, Ph.D., dated May 31, 2023, is attached hereto as **Exhibit D**.

6. A true and correct copy of Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation's Responses and Objections to Defendant and Counterclaimant Ross Intelligence, Inc.'s First Set of Counterclaim Requests for Admission (No. 136), dated October 20, 2022, is attached hereto as **Exhibit E**.

7. A true and correct copy of excerpts from the transcript of Mark Hoffman's deposition on April 25, 2023, is attached hereto as **Exhibit F**.

8. A true and correct copy of Thomson Reuters General Terms and Conditions, last modified on August 2023, is attached hereto as **Exhibit G**.

9. A true and correct copy of Thomson Reuters' Westlaw Precision Slide Deck, Bates stamped TRCC-00194341, is attached hereto as **Exhibit H**.

10. A true and correct copy of an article titled "Thomson Reuters Profit Tops Estimates as It Plans AI Push," dated May 2, 2023, is attached hereto as **Exhibit I**.

11. A true and correct copy of an article titled "Thomson Reuters to Acquire Legal AI Firm Casextext for \$650 Million," dated June 27, 2023, is attached hereto as **Exhibit J**.

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12. A true and correct copy of the Reply Report of Defendant/Counterclaimant's Expert James D. Ratliff, Ph.D., dated July 20, 2023, is attached hereto as **Exhibit K**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in San Francisco, California on August 31, 2023.

/s/ Beatrice B. Nguyen

Beatrice B. Nguyen